

United States District Court

SEP - 2 2016

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Saul Amador-Jaimes

PRINCIPAL

the United Mexican States

Case Number:

YOB: 1995

M-16-1651 -M

Eliel Jaimes-Santoyo

CO-PRINCIPAL

the United Mexican States

YOB: 1990

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 1, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jose Luis Moreno-Mosqueda, Irvin Ivan Chavez-Perez and Francisco Amador-Vasquez, citizens and nationals of the United Mexican States, along with two (2) other citizens and nationals of the United Mexican States, for a total of four (4), who had come to, entered, or remained in the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 29, 2016, Agents assigned to the South Texas Corridor McAllen Area Joint Targeting team (STC-M JTT) along with Hidalgo County Constables conducted separate knock and talks at three locations in Donna, Alamo and Weslaco, Texas. A total of twenty-one illegal aliens were apprehended. Agents conducted an interview with a cooperating defendant in the smuggling case. The cooperating defendant revealed the identity of several brush guides working with him and provided an address of 3215 Hoehn Road Apartment 3, Edinburg, Texas, as a stash house.

On September 1, 2016, STC-M JTT followed up on the address, 3215 Hoehn Road Apartment 3, Edinburg, Texas, provided by the cooperating defendant. Agents recognized a tan Ford Explorer parked near apartment 3. Agents observed the tan Explorer attempting to depart the apartment complex. As the tan Explorer attempted to depart, agents and Hidalgo County Constables entered the driveway leading to the apartment complex and the driver and passenger exited the vehicle. The driver, later identified as Eliel JAIMES-Santoyo, was detained and the passenger, later identified as Saul AMADOR-Jaimes, was observed by a Hidalgo County Constable run back toward the apartment announcing the presence of law enforcement. The Hidalgo County Constable observed four people run out of the apartment. All the people who were in the apartment, along with the passenger of the tan Explorer were eventually located. Agents questioned all six people, including the driver and passenger, as to their immigration status and determined them all to be illegally present in the United States.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Sworn to before me and subscribed in my presence,

September 2, 2016
DatePeter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Complainant

Jon Chan Senior Patrol Agent

Printed Name of Complainant

McAllen, Texas
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16- 1651 -M

**RE: Saul Amador-Jaimes
Eliel Jaimes-Santoyo**

CONTINUATION:

All six illegal aliens were placed under arrest and transported to the Weslaco Station for debrief and case preparation.

Principal Statement 1:

Saul AMADOR-Jaimes was read his Miranda Rights, stated he understood his rights and refused to provide a sworn statement without the presence of an attorney.

Principal Statement 2:

Eliel JAIMES-Santoyo was read his Miranda Rights, stated he understood his rights and refused to provide a sworn statement without the presence of an attorney.

Material Witness Statements:

Jose Luis MORENO-Mosqueda, Irvin Ivan CHAVEZ-Perez and Francisco AMADOR-Vasquez, citizens and nationals of the United Mexican States, were read their Miranda Rights, stated they understood their rights and agreed to provide a sworn statement without the presence of an attorney.

Material Witness 1:

MORENO stated he made his smuggling arrangements with an unknown smuggler and crossed the Rio Grande River seven to eight weeks ago. MORENO was then transported to an apartment where a man named Eliel lived. MORENO claimed that Eliel knew he was an illegal alien and his family paid a total of 900.00 USD to be smuggled by Eliel. MORENO stated four men, who Eliel introduced as his cousins, would frequent the apartment and discuss their role as brush guides.

MORENO identified Saul AMADOR-Jaimes through a photo lineup as a brush guide.

MORENO identified Eliel JAIMES-Santoyo through a photo lineup as the person living at the apartment.

Material Witness 2:

CHAVEZ claimed his aunt made his smuggling arrangements and was charged a total of 4,000 USD to be smuggled to Houston, Texas. CHAVEZ stated he crossed the Rio Grande River on a raft with four other people. On August 5, 2016, near Reynosa, Mexico. Once in the United States, CHAVEZ stated he was transported to several stash houses, including being transported to a house by a person named Saul. CHAVEZ stated Saul wanted him to pay 2,500 USD to be smuggled to Houston. CHAVEZ asked to pay his debt by guiding groups and Saul agreed and told CHAVEZ he would teach him. CHAVEZ stated he was transported to Saul's cousin's apartment the day before he was arrested. When they arrived to the apartment, only Saul's cousin, Eliel JAIMES-Santoyo, and one other man was there. CHAVEZ stated on the day he was arrested, Saul and his Saul's cousin left to get food when he heard Saul banging on the window yelling for everyone to get out. Everyone in the apartment ran outside and were eventually caught by law enforcement.

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CONTINUATION:

CHAVEZ identified Saul as Saul AMADOR-Jaimes through a photo Lineup.

Material Witness 3:

AMADOR claimed his brother paid an unknown amount of money to have him smuggled to Las Vegas, Nevada. AMADOR stated that once in the United States, he and his group were transported to his cousin, Saul AMADOR-Jaimes' house, before being smuggled further north. AMADOR stated he suspected his cousin of being involved in guiding illegal aliens.